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Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

- - - - - x  
:  
In re: : Chapter 11  
:  
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)  
et al., :  
:  
Debtors. : Jointly Administered  
- - - - - x

**DEBTORS' RESPONSE AND OBJECTION TO MOTION FOR APPLICATION  
FOR PAYMENT OF TAXES FILED BY THE CITY OF NEWPORT NEWS**

The debtors and debtors in possession in the above-captioned jointly administered cases (collectively, the "Debtors")<sup>1</sup> hereby respond and object (the "Response") to the

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs,

Motion for Application for Payment of Taxes (the "Motion") filed by the City of Newport News, Virginia (the "Movant"). In support of the Response, the Debtors respectfully represent as follows:

**OBJECTION**

1. The Debtors have reviewed their books and records and the Claim as set forth in the Motion is a tax claim for business personal property taxes for the year of 2008, thereby making the Claim a pre-petition tax claim that is not entitled to administrative priority under 11 U.S.C. § 503.

2. As a pre-petition claim, the Claim will be treated and handled in the normal manner through the claims resolution process.

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Inc.(6796), Sky Venture Corp. (0311), Prahs, Inc.(n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address is 9950 Mayland3 Drive, Richmond, Virginia 23233.

WHEREFORE, for the foregoing reasons, the Debtors respectfully requests that his Court sustain the objections raised in the Response and deny the relief sought in the Motion

Dated: July 16, 2009 SKADDEN, ARPS, SLATE, MEAGHER &  
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